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November 17, 2021

Honorable Stephen L. Crocker  
United States Magistrate Judge  
120 North Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Mohammad Haroon Imaad*  
Case No. 21-cr-91-wmc

Dear Judge Crocker:

I write in response to the government's letter concerning the good-time credit. Mr. Corey and I have gone back and forth with case law on this issue and even a phone call at 6:40 this morning—his idea, not mine. As an advocate, I planned to write this morning and inform the Court about the negative case law, but Mr. Corey beat me to the punch. His brief was done and we saw no reason to hold off. I will add that his assessment of the Second Circuit case is accurate. I would, however, note that while the *Slatkin* quote is the most damning for my position, the cases it cites in support are not as broad as it states.

All that being said, I want to acknowledge that in other Circuits there are cases that cut against my position, but there is nothing in the Seventh Circuit that would close the door to this argument. Further, I would add that while Wisconsin's good-time provision may not be assimilated into this sentencing, it does not change the fact that for the identical crime taking place off the military base, Mr. Imaad would serve no more than 68 days.

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Thank you for your attention to this matter.

Sincerely

*/s/ Joseph A. Bugni*

Joseph A. Bugni  
Associate Federal Defender